

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 21-30589 (JCW)

**SECOND AMENDED<sup>2</sup> NOTICE OF AGENDA OF MATTERS  
SCHEDULED FOR HEARING ON OCTOBER 20, 2021**

Time of Hearing: 9:30 a.m. (prevailing Eastern Time)

Location of Hearing: The hearing scheduled for Wednesday, October 20, 2021, at 9:30 a.m. will be conducted in person in **Courtroom 8**, U.S. Bankruptcy Court, 401 W. Trade Street, Charlotte, NC 28202. Livestreaming will be available in Courtrooms 2B and 2A, if necessary. If attorneys do not anticipate speaking during the hearing, please consider observing the proceedings from Courtroom 2B or 2A.

**TELEPHONIC APPEARANCES** are limited to attorneys announcing an appearance for a client in this case. Otherwise, you may appear in person or listen to the recording of the hearing using a Pacer account. Recordings will be made available on the court's docket generally within 24 hours of the hearing.

Please contact Judge Whitley's law clerk, Ayrin Cooke at [Ayrin\\_Cooke@ncwb.uscourts.gov](mailto:Ayrin_Cooke@ncwb.uscourts.gov) if you have further questions or need dial-in instructions.

1. Debtor's Application for an Order Authorizing the Retention and Employment of Epiq Corporate Restructuring, LLC, as Claims, Noticing and Ballot Agent [Dkt. 6].

**Status: This matter is going forward.**

Objection Deadline: October 20, 2021 at 9:30 a.m., prevailing Eastern Time

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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

<sup>2</sup> **Amended agenda items appear in bold.**

Related Documents:

- A. Informational Brief of LTL Management LLC [Dkt. 3] (the “Informational Brief”).
- B. Declaration of John K. Kim in Support of First Day Pleadings [Dkt. 5] (the “First Day Declaration”).
- C. Debtor’s Ex Parte Motion for Entry of an Order (I) Scheduling an Emergency Hearing on Certain First Day Pleadings and (II) Approving the Form and Manner of Limited Notice Thereof [Dk. 22] (the “Emergency Hearing Motion”).
- D. Ex parte Order Granting the Emergency Hearing Motion [Dkt. 34] (the “Emergency Hearing Order”).
- E. Notice of Chapter 11 Filing and of Emergency Hearing on First Day Pleadings [Dkt. 37] (the “Notice of Emergency Hearing”).

Objections Received: None to date.

- 2. Debtor’s Motion for an Order: (I) Authorizing It to File a List of the Top Law Firms with Talc Cases against the Debtor in Lieu of the List of 20 Largest Unsecured Creditors; (II) Approving Certain Notice Procedures for Talc Claimants; and (III) Approving the Form and Manner of Notice of Commencement of this Case [Dkt. 7].

**Status: This matter is going forward.**

Objection Deadline: October 20, 2021 at 9:30 a.m., prevailing Eastern Time

Related Documents:

- A. Informational Brief.
- B. First Day Declaration.
- C. Emergency Hearing Motion.
- D. Emergency Hearing Order.
- E. Notice of Emergency Hearing.

Objections Received:

- F. Maune Raichle Hartley French & Mudd, LLC’s Objection to (A) Debtor’s Motion for an Order: (I) Authorizing it to File a List of the Top Law Firms with Talc Cases Against the Debtor in Lieu of the List of the 20 Largest Unsecured Creditors; (II) Approving Certain Notice Procedures for Talc Claimants; and (III) Approving the Form and Manner of Notice of Commencement of this Case;

and (B) Debtor's Motion for Entry of an Order Establishing Certain Notice, Case Management and Administrative Procedures [Dkt. 51] (the "Notice Objection").

- G. Limited Omnibus Objection of the MDL Plaintiffs' Steering Committee to the Debtor's First Day Motions [Dkt. 67] (the "Omnibus Objection").
  - H. Limited Objection and Reservation of Rights of the Blue Cross and Blue Shield Association to Debtor's Motion for an Order: (I) Authorizing It to File a List of the Top Law Firms with Talc Cases against the Debtor in Lieu of the List of 20 Largest Unsecured Creditors; (II) Approving Certain Notice Procedures for Talc Claimants; and (III) Approving the Form and Manner of Notice of Commencement of this Case [Dkt. 72].
3. Debtor's Motion for Entry of an Order Establishing Certain Notice, Case Management and Administrative Procedures [Dkt. 10].

**Status: This matter is going forward.**

Objection Deadline: October 20, 2021 at 9:30 a.m., prevailing Eastern Time

Related Documents:

- A. Informational Brief.
- B. First Day Declaration.
- C. Emergency Hearing Motion.
- D. Emergency Hearing Order.
- E. Notice of Emergency Hearing.

Objections Received:

- F. Notice Objection.
4. Debtor's Motion for an Order: (I) Approving the Continued Use of its Bank Account and Business Forms; (II) Granting a Waiver of the Requirements of Section 345(b) of the Bankruptcy Code; and (III) Authorizing the Debtor's Bank to Charge Certain Fees and Other Amounts [Dkt. 11].

**Status: This matter is going forward.**

Objection Deadline: October 20, 2021 at 9:30 a.m., prevailing Eastern Time

Related Documents:

- A. Informational Brief.

- B. First Day Declaration.
- C. Emergency Hearing Motion.
- D. Emergency Hearing Order.
- E. Notice of Emergency Hearing.

Objections Received:

- F. Omnibus Objection.
5. Debtor's Emergency Motion to Enforce the Automatic Stay Against Talc Claimants Who Seek to Pursue Their Claims Against the Debtor and its Non-Debtor Affiliates [Dkt. 44] (the "Stay Enforcement Motion").

**Status: The Emergency Hearing Motion (defined below) is going forward. If the Court grants the Emergency Hearing Motion, the Court will consider the Stay Enforcement Motion.**

Objection Deadline: October 20, 2021 at 9:30 a.m., prevailing Eastern Time

Related Documents:

- A. Informational Brief.
- B. First Day Declaration.
- C. Debtor's Ex Parte Motion Requesting Authority to Exceed Maximum Page Limit [Dkt. 43].
- D. Debtor's Ex Parte Motion for Entry of an Order Scheduling an Emergency Hearing on the Motion to Enforce the Automatic Stay [Dkt. 45] the ("Emergency Hearing Motion").
- E. Ex Parte Order Granting the Debtor Authority to Exceed Maximum Page Limit [Dkt. 46].
- F. Motion to Strike (defined below).
- G. **Order on Debtor's Ex Parte Motion for Entry of an Order Scheduling an Emergency Hearing on the Motion to Enforce the Automatic Stay and MDL Plaintiffs Steering Committee Ex Parte Motion to Shorten Notice [Dkt. 94] (the "Emergency Hearing Order").**

Objections Received:

- H. Maune Raichle Hartley French & Mudd, LLC's Objection to Debtor's Emergency Motion to Enforce the Automatic Stay against the Debtor and its Non-Debtor Affiliates [Dkt. 53].
- I. **Reservation of Rights and Preliminary Objection of Cyprus Mines Corporation to Debtor's Emergency Motion to Enforce the Automatic Stay against Talc Claimants Who Seek to Pursue Their Claims against the Debtor and its Non-Debtor Affiliates [Dkt. 100].**
- J. **Nedelka Vanklive's (I) Response/Objection to Debtor's Emergency Motion to Enforce the Automatic Stay against Talc Claimants Who Seek to Pursue Their Claims against the Debtor and its Non-Debtor Affiliates, or, in the Alternative (II) Motion for Abstention as to Pending California Action, and (III) Objection to Debtor's *Ex Parte* Motion Requesting Authority to Exceed Maximum Page Limit [Dkt. 102].**
- K. **Aylstock, Witkin, Kreis & Overholtz PLLC's (I) Objection to Debtor's *Ex Parte* Motion for an Emergency Hearing; (II) Preliminary Response to Debtor's Emergency Motion to Enforce the Automatic Stay; and (III) Joinder in Related Filings [Dkt. 103] (the "Joinder").**
- 6. Motion of the MDL Plaintiffs' Steering Committee to Strike Debtor's Emergency Motion to Enforce the Automatic Stay and Objection to Scheduling an Emergency Hearing; and, in the Alternative, Motion to Reconsider the Order Scheduling an Emergency Hearing [Dkt. 76] (the "Motion to Strike").

**Status: The Motion to Shorten Notice (defined below) is going forward. If the Court grants the Motion to Shorten Notice, the Court will consider the Motion to Strike.**

Objection Deadline: October 20, 2021 at 9:30 a.m., prevailing Eastern Time

Related Documents:

- A. Informational Brief.
- B. First Day Declaration.
- C. Stay Enforcement Motion.
- D. Emergency Hearing Motion.
- E. Ex Parte Motion to Shorten Notice on Motion to Strike [Dkt. 77] (the "Motion to Shorten Notice").
- F. **Emergency Hearing Order.**
- G. **Joinder.**

Objections Received: None to date.

Dated: October 20, 2021  
Charlotte, North Carolina

Respectfully submitted,

/s/ John R. Miller, Jr.

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PROPOSED ATTORNEYS FOR DEBTOR